

# **EXHIBIT E**

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June 16, 2023

*Confidential*  
*Via E-mail*

Stormwater Authority of the City of Chester  
c/o Steven Hann, Esquire  
c/o William G. Roark, Esquire  
Hamburg, Rubin, Mullin, Maxwell & Lupin, P.C.  
375 Morris Road  
P.O. Box 1479  
Lansdale, PA 19446

Re: *In re City of Chester, Pennsylvania, No. 22-13032, (E.D. Pa.), Chapter 9 Proceeding*

Dear Counsel:

Ballard Spahr LLP serves as counsel for the City of Chester in connection with its above-referenced chapter 9 bankruptcy case. The primary goal of the bankruptcy case is to formulate a viable plan of adjustment that will effectuate a financial restructuring of the City's obligations and assist Chester in emerging from decades of financial oversight. In furtherance of this goal, we are in the process of detailing all assets and liabilities of the City.

As briefly discussed during our call on Friday, June 16, 2023, included below are the City's requests for information from the Stormwater Authority of the City of Chester (SACC). We are requesting the delivery of these documents at your earliest convenience, and no later than **Friday, June 30, 2023**.

1. Current stormwater fee rate resolution;
2. 2023 adopted Budget;
3. Actual revenues and expenditures by detailed line items for Years 2020 – 2022;
4. Audited financial statements Years 2020-2022;
5. Most recent Capital Improvement Plan;

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6. Multi – year stormwater budget (including capital needs) used to establish the stormwater fee;
7. Listing of all assets owned by SACC;
8. GIS data layers provided as a geodatabase (preferred) and/or shapefile which include the following:
  - a. Storm sewer features (inlets, pipes, catch basins, culverts, detention basins, outfalls, etc.);
  - b. Delineations of City owned vs. private stormwater management facilities (detention basins, infiltration beds, rain gardens, inlets, pipes, etc.);
  - c. Watershed boundaries (streams and/or inlets/outlets);
  - d. Layers showing historical stormwater problems or areas of flooding;
  - e. Any other pertinent layers related to stormwater;
9. The number, type, and description of system assets, including manholes, catch basins, swales, detention basins, outfalls, BMPs, pipes by size and material;
10. The years of acquisition for assets stated in Item 7 (this may be most conveniently available from your public accountants' depreciation work papers);
11. A completed set of Rules and Regulations;
12. Copy of all current regulatory permits governing the system, including MS4 and/or other NPDES Permits;
13. Current Pollution Reduction Plan;
14. List of all projects completed in the current Pollution Reduction Plan;
15. Long Term Control Plan that covers assets owned by SACC, if applicable;
16. Any DEP/EPA violation records and/or inspection records/reports;
17. Reports, studies, maintenance records, and other available documents to understand the type, size and location of infrastructure needs, flooding problems, etc.; and

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18. Capital Improvement Plan projects currently under construction (or planned to be bid this year);

We are happy to discuss the establishment of a share file for the most efficient transmission of the documents. Please let me know if you have any questions.

Sincerely,

*Tobey M. Daluz*

Tobey M. Daluz

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